



SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**

FILED

2021 MAY -5 PM 3:00

U.S. MAGISTRATE .

BY _____

CHRISTOPHER CHIOU
Acting United States Attorney
District of Nevada
Nevada Bar Number 14853
AUSA Edward G. Veronda
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Edward.G.Veronda@usdoj.gov
Representing the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUAN MANUEL GALINDO-MURRILLO,

Defendant.

Case No. 2:21-MJ-00380-VCF

APPLICATION TO SEAL

COMES NOW the United States of America, by and through Christopher Chiou, Acting United States Attorney, and Edward G. Veronda, Assistant United States Attorney, respectfully moves this Honorable Court for an Order sealing the Complaint, this Application and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

In this case, an order sealing the Complaint would be appropriate because the attached Complaint relates to an ongoing criminal investigation into violations of 21 United States Code, Section(s) 841(a)(1) and (b)(1)(C).; that is neither public nor known to all of the targets of the investigation, and its disclosure may alert the targets to the ongoing investigation. Accordingly, there is reason to believe that the disclosure of the information contained within the Complaint will


1 jeopardize the investigation, including by giving the accused an opportunity to flee or continue flight
2 from prosecution, destroy or tamper with evidence, change patterns of behavior, or notify
3 confederates.

4 The Government further submits that it is necessary for the Complaint to be sealed in light of
5 the fact that the Government can conclude the investigation without putting in jeopardy the
6 investigation, the accused, law enforcement, and any evidence to be seized by a search warrant law
7 enforcement plans to execute simultaneously with this complaint.

8 DATED: May 5, 2021.

9 Respectfully submitted,

10 CHRISTOPHER CHIOU
Acting United States Attorney

11 
12 EDWARD G. VERONDA
13 Assistant United States Attorney
14
15
16
17
18
19
20
21
22
23
24

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FILED

2021 MAY -5 PM 3:08

U.S. MAGISTRATE JUDGE

Case No. 2:21-MJ-00380-VCF

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUAN MANUEL GALINDO-MURRILLO,

Defendant.

ORDER TO SEAL

Based on the pending Application of the Government, and good cause appearing therefor,
IT IS HEREBY ORDERED that the Complaint, the Government's Application and this Court's
Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 5 day of May, 2021.


HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE